

Achieving the goals of NAIS in the cow/calf segment of our industry will require a concerted effort on the part of producers, markets and USDA if total compliance is to be obtained without major disruption in the production chain.

Animals should only be required to be identified when they enter commerce or are commingled and not before, since these are the only times that their movement or even existence impacts disease programs. Many small producers face an inadequate supply of labor and lack the facilities required to tag and individually identify animals. There is concern that this inability to comply will purge the marketplace of small producers as well as local auction markets, both of which contribute greatly to Mississippi's cattle industry. Can compliance of less than 100% be adequate for the national surveillance program?

The one-at-a-time marketing system used in auction barns in the Southeast and many other areas of the country will provide unique challenges to the ID and traceback systems. Services provided through local veterinarians or even "custom tagging stations" should be considered to aid producers in identifying their animals as they enter commerce. Forcing producers to tag and identify animals before this point will increase the incidence of lost tags, thus adding more cost for producer, and more importantly cause confusion over the purpose of the system, which is to provide information to the government **only** in the event of a disease outbreak.

Given current funding and available technology, reaching the announced timeline will be very difficult. Additional investment is needed to provide infrastructure to equip farms and markets with needed resources. Unfortunately, the cow/calf producer will carry a large part of the cost of compliance with initial tagging, shrinkage, facilities and labor required. To yield compensation for the producer, NAIS should be incorporated as a market driven system that will reward producers for their compliance; this will lead to the achievement of the NAIS goals far faster than the threat of a mandatory system. Programs that give the option of adding value to cattle will continue to increase producer involvement, and data management systems should allow the opportunity for such activities.

Existing data management and collection systems should be used to move NAIS forward more quickly and to encourage wider acceptance of the program through their market driven approach. A private repository for data would help ease confidentiality concerns and would also be more responsive to changes in technology than a federally managed database. A privately managed system owned and overseen by an industry consortium would have much more flexibility to protect data from unintended uses. Government access would only be granted to obtain the information necessary for successful traceback in the event of a disease outbreak.

The network already in place with state animal health officials should be utilized to take advantage of the system currently responsible for disease surveillance. This network, along with a privately held data management system, could provide the least cost, most effective method to meet the traceback goals the industry has set.